

July 24, 2011

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Response to the Draft Environmental Impact Report (DEIR) for the proposed Excelaron (Huasna Oil Field) project.

The Executive Summary, which is probably the only part of the EIR that most people will read, does not adequately represent the project or its impacts. Page ES-9 of the Executive Summary states that mitigation measures for impacts to transportation include "restrictions on the use of Porter Ranch road during high water events." What an understatement!

The mitigation says that they will shutdown their entire facility, **thus producing no oil, tax revenue, or jobs** whenever Twitchell Reservoir reaches an elevation of 595 feet, which can be for entire years at a time. This is a mitigation that cannot possibly be economically feasible for Excelaron.

In the transportation section of the EIR it says, "a water level of 590 feet could still impact the road due to soil saturation, which could result in loss of stability of the road and result in a truck accident or spill." But the suggested mitigation is to allow traffic to pass at a higher and unsafe water level of 595 feet.

This suggested mitigation, according to the EIR, could result in an oil spill alongside Twitchell Reservoir, and yet there is no mention of this or the extended closure of the facility in the executive summary. The EIR goes on to conclude that any impacts associated with traffic safety would be less than significant with mitigation, but any potential for oil spill should be listed as a Class I impact on biology, soil, hazardous materials, and water.

Also, the Executive Summary only mentions transporting oil to a destination refinery in Kern County, Los Angeles County, or Ventura County. But in the project description they include Conoco-Phillips in Nipomo, which will have additional unanalyzed traffic impacts in our County.

It also says that the peak number of oil trucks would be six per day, but they are forgetting about the 12 trucks per month that are backhauling lighter blend oil. That blend oil will all need to be transported back out with the 1,000 barrels per day of tar and those extra twelve trips a month add up to 3,000 trips over a twenty year life of the project.

Finally, the executive summary mentions propane but doesn't mention one 2,500 gallon truck per day as part of the truck traffic. Over a twenty year life of the project that is 18 million gallons of propane burned in Huasna and Over 7,000 truck trips.

I'm requesting the Final EIR require all traffic from this project (excluding county inspectors) use the Porter road exit. This will greatly improve road safety, noise, and road dust.

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